

1 Gail E. Cohen (093210)
2 Misty A. Murray (196870)
BARGER & WOLEN LLP
3 633 West Fifth Street, 47th Floor
Los Angeles, California 90071
Telephone: (213) 680-2800
4 Facsimile: (213) 614-7399

5 Attorneys for Defendants
UNUM Life Insurance Company of America
6 and Community Hospitals of Central
California Long-Term Disability Plan
7

8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA**

10
11 MARY ANN LEWIS, an individual,) CASE NO.: 1:05 CV-00459 AWI:SMS
12 Plaintiff, }
13 vs. }
14 UNUM LIFE INSURANCE COMPANY Motion C/O: June 2, 2006
15 OF AMERICA, a Maine corporation; Pre-Trial Conf: July 14, 2006
16 COMMUNITY HOSPITALS OF Trial: August 22, 2006
17 CENTRAL CALIFORNIA LONG
TERM DISABILITY PLAN, an
Employee Welfare Benefit Plan; and
18 DOES 1 through 10, inclusive,
Defendants.

Complaint Filed: April 8, 2005

19 **STIPULATION**
20

21 WHEREAS, the current motion cut off-date for this case is June 2, 2006;
22

23
24
25 WHEREAS the Pre-Trial Conference for this case is currently set for July
26 14, 2006, the last day to file and serve opening briefs is August 8, 2006 and the
27 Trial is set to begin on August 22, 2006;
28

1 WHEREAS, the parties participated in private mediation on April 24,
2 2006 and have continued settlement discussions since that date;
3

4 WHEREAS, the parties agreed to continue the pre-trial and trial dates in
5 this case for 45 days in an effort to reach a settlement;
6

7 WHEREAS, the requested extension will permit the parties sufficient
8 time to continue settlement negotiations and avoid the additional attorneys' fees
9 and costs preparing dispositive motions by the current June 2, 2006 due date;
10

11 WHEREFORE, and in consideration of the above facts, the undersigned
12 parties through their attorneys of record request the Court to authorize the
13 following extensions:
14

15 Motion cut-of date: July 17, 2006
16

17 Pre-trial conference: August 25, 2006
18

19 Last Day to File Opening Briefs: September 25, 2006
20

21 Trial date: October 6, 2006
22

23 All other pre-trial dates shall be in accordance with the Local Rules and
24 the Court's Standing Order based upon the continued trial date.
25

26 IT IS SO STIPULATED:
27

28 By: /s/ Alan D. Cates

Alan D. Cates, Esq.

By: /s/ Steven P. Krafchick

Steven P. Krafchick, Esq.

1 Attorneys for Plaintiff
2 MARY ANN LEWIS

3 BARGER & WOLEN, L.L.P.

4 By: /s/ Misty A. Murray

5 Misty A. Murray, Esq.
Gail E. Cohen, Esq.

6 Attorneys for Defendants

7 UNUM LIFE INSURANCE COMPANY
OF AMERICA & COMMUNITY
HOSPITALS OF CENTRAL CALIFORNIA
8 LONG TERM DISABILITY PLAN

Attorneys for Plaintiff
MARY ANN LEWIS

9
10 **ORDER**

11 Upon consideration of the foregoing Stipulation, AND FOR GOOD CAUSE
12 APPEARING,

13 IT IS HEREBY ORDERED THAT the parties' Stipulation shall be the Order
14 of the Court. The new dates shall be as follows:

15
16 Motion cut-of date: July 17, 2006

17 Pre-trial conference: August 25, 2006

18 Last Day to File Opening Briefs: September 25, 2006

19 Trial date: October 3, 2006 (Tuesday)

20
21 IT IS SO ORDERED.

22
23 Dated: June 5, 2006

/s/ Anthony W. Ishii

24 0m8i78

25 UNITED STATES DISTRICT JUDGE